



September 16, 2019

VIA ECF

Hon. John G. Koeltl
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Application granted to the extent requested in the final paragraph of this letter. So ordered.
9/17/19 JGK

RE: *Goitein v. Just Energy Group Inc. et al.*, No. 19-cv-07181-JGK

Dear Judge Koeltl:

We represent Defendant Just Energy Group Inc. in this putative securities class action. We note that two related putative securities class actions, *White v. Just Energy Group, Inc. et al.*, 19-cv-08236-JGK, and *Brodeur v. Just Energy Group Inc. et al.*, 19-cv-08286-JGK, have also been filed in this Court. Pursuant to Rule 1.E of Your Honor's Individual Practices, we write to respectfully request that Defendants' time to move, answer or otherwise respond to the complaint in this action be extended to a date to be established after a lead plaintiff has been appointed pursuant to the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4(a)(3), and an amended complaint (if any) has been filed.

Just Energy's current deadline for responding to the complaint in this action is September 17, 2019. The deadline for the filing of motions for appointment of lead plaintiff and lead counsel is September 30, 2019. Once lead plaintiff has been appointed, it is likely that it will desire to file an amended complaint. Accordingly, resources of the parties and this Court will be conserved by deferring Defendants' time to respond until after an operative pleading has been filed. This is the first request for an adjournment or extension of time.

We conferred with Plaintiff's counsel, and propose entry of an order setting the following schedule:

- Lead Plaintiff shall have 60 days from the order appointing a lead plaintiff to file an amended complaint;

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- Defendants shall have 60 days from the filings of the amended complaint to answer, move, or otherwise respond;
- If any Defendants move to dismiss, Lead Plaintiff shall have 45 days to file an opposition and such Defendants shall then have 45 days to file a reply.

Accordingly, Defendants respectfully request an extension of time to move, answer or otherwise respond to the complaints in cases 19-cv-07181-JGK and 19-cv-08236-JGK, and 19-cv-08286-JGK until a date certain to be set after a lead plaintiff has been appointed and an amended complaint has been filed.

Respectfully submitted,

/s/ Jason Cyrulnik
Jason Cyrulnik

cc: Counsel of record (via ECF)
